

March 1, 2023

**VIA ECF**

The Honorable William F. Kuntz, II  
United States District Court Judge  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Plaintiffs #1-21 v. County of Suffolk, et al.*, Case No. 15-cv-2431 (E.D.N.Y.)

Dear Judge Kuntz:

We write on behalf of Plaintiffs and the County Defendants<sup>1</sup> (collectively, the “Parties”) in the above-referenced action to respectfully submit a request for an extension of the deadline to file the Class Action Settlement Agreement. The deadline was originally set by your Honor in the Joint Stipulation and Scheduling Order, entered on July 29, 2022, and further extended to February 9, 2023, and then again to March 1, 2023, by orders entered by Your Honor on September 26, 2022, December 27, 2022, and February 3, 2023. *See* Dkt. Nos. 418, 421, 422, and 426.

As the Court is aware, the Parties have reached an agreement in principle and are in the process of finalizing the Settlement Agreements as well as our Joint Motion for Preliminary Approval of Class Action Settlement Agreement and Approval of Notice to the Class. The Parties had anticipated filing today in accordance with the Court’s most recent order; however, the Parties have encountered an unanticipated issue that will require a few additional days to resolve. Given the time and resources that have been dedicated towards reaching a final settlement, the Parties request a further brief extension until Monday March 6, 2023 to file the Settlement Agreement.

The Parties believe that there is good cause to extend the current deadline to file the Settlement Agreements, and that the requested extension will not unduly delay this case nor operate as a prejudice against any of the Parties.

In accordance with Your Honor’s Individual Rule I.C.5, the Parties state as follows:

- (1) The Parties seek an extension of the deadline to submit the Settlement Agreements. The Parties seek to extend the deadline by 5 days.

<b><u>Event</u></b>	<b><u>Original Deadline</u></b>	<b><u>Current Deadline</u></b>	<b><u>Proposed Revised Deadline</u></b>
Deadline to submit the Settlement Agreements	September 27, 2022	March 1, 2023	March 6, 2023

- (2) The Parties previously made three requests for the extension of the deadline for submission of the Settlement Agreements on September 23, 2022, December 23,

---

<sup>1</sup> The County Defendants are the County of Suffolk, Suffolk County Police Department, Commissioner Edward Webber, Lieutenant Milagros Soto, Supervisory John Doe Defendants, and John Doe Defendants.

2022, and February 1, 2023.

(3) The Parties' previous requests for the extension of the deadline for submission of the Settlement Agreements were granted by Your Honor on September 26, 2022, December 27, 2022 and February 3, 2023.

(4) This request is being made with the consent of both Parties.

We thank the Court for its attention to this matter and are available at the Court's convenience if it has any questions regarding this request.

Respectfully submitted,

By: /s/ Jose Perez

Jose Perez  
Ghita Schwarz  
LATINOJUSTICE PRLDEF  
475 Riverside Drive, Suite 1901  
New York, NY 10115  
(212) 219-3360  
jperez@latinojustice.org  
gshwartz@latinojustice.org

/s/ Atara Miller

Atara Miller  
Katherine Fell  
Samantha A. Lovin  
MILBANK LLP  
55 Hudson Yards  
New York, NY 10001-2163  
(212) 530-5000  
amiller@milbank.com  
kfell@milbank.com  
slovin@milbank.com

*Counsel for Plaintiffs #1-21*

Respectfully submitted,

By: /s/ Christiana S. McSloy

Christiana S. McSloy  
Marc Lindemann  
Dana L. Kobos  
SUFFOLK COUNTY  
ATTORNEY'S OFFICE  
H. Lee Dennison Building  
100 Veterans Memorial Highway  
P.O. Box 6100  
Hauppauge, NY 11788  
(631) 853-2944  
christiana.mcsloy@suffolkcountyny.gov  
marc.lindemann2@suffolkcountyny.gov  
dana.kobos@suffolkcountyny.gov

*Counsel for County Defendants*